

Exhibit 1

From: [Emily Kirsch](#)
To: [Shen, Andrew C.](#); [Lisa Frey](#)
Cc: [Kellogg, Michael K.](#); [Rapawy, Gregory G.](#)
Subject: [EXTERNAL] RE: In re. 9/11
Date: Tuesday, November 9, 2021 10:19:54 AM

Dear Andy:

We have answered your question.

We are happy to meet and confer, though in light of the facts that (1) I have already answered your question and (2) you have stated that you have no intention of dropping the issue, I am unsure whether your request to do so is genuine.

Regards,

Emily

Emily Bab Kirsch
KIRSCH & NIEHAUS
O: 212-832-0170
M: 917-744-2888

From: Shen, Andrew C.
Sent: Tuesday, November 9, 2021 9:28 AM
To: Emily Kirsch ; Lisa Frey
Cc: Kellogg, Michael K. ; Rapawy, Gregory G.
Subject: RE: In re. 9/11

Emily –

Your email does not state whether Kreindler & Kreindler has produced all communications and phone history between the named witnesses and Ms. Crotty. Please confirm that it has done so, or advise as to whether you are willing to meet and confer about this issue on our call today at 4pm, pursuant to Paragraph II.C of Judge Netburn’s Individual Practices in Civil Cases.

Your email states that you will “not be responding further” to our requests. We do not intend to drop this issue, nor do we agree with your characterization of the hearing testimony. If you are unwilling to provide confirmation or meet and confer about this issue, we will seek appropriate relief from the Court.

Regards,

Andy

From: Emily Kirsch <emily.kirsch@kirschniehaus.com>
Sent: Monday, November 8, 2021 8:28 PM
To: Shen, Andrew C. <ashen@kellogghansen.com>; Lisa Frey <lisa.frey@kirschniehaus.com>
Cc: Kellogg, Michael K. <mkellogg@kellogghansen.com>; Rapawy, Gregory G. <grapawy@kellogghansen.com>
Subject: [EXTERNAL] RE: In re. 9/11

Dear Andy:

We have reviewed your below request. We confirm that Kreindler & Kreindler has complied fully with its discovery obligations, including communications and phone history, that were required by the Court’s October 21, 2021 Order.

We note there is no evidence - and you cite to none – to suggest that the Kreindler firm may not have complied fully with its obligations. We see nothing in the record that shows that Ms. Crotty provided legal advice or had any knowledge of Mr. Fawcett’s actions prior to September 27, 2021 at

the earliest; in fact, what we do see is that you attempted – and failed – to elicit just such testimony. (*Fawcett* 480-482).

This inquiry is obviously motivated by an effort to create a misimpression about the Kreindler firm's compliance and not by any good faith or proper purpose. Please understand that we will not be responding to further such improper requests.

With respect to your November 4 letter, we do not consent to the motion.

Regards,

Emily

Emily Bab Kirsch
KIRSCH & NIEHAUS
O: 212-832-0170
M: 917-744-2888

From: Shen, Andrew C. <ashen@kelloggghansen.com>

Sent: Monday, November 8, 2021 5:21 PM

To: Emily Kirsch <emily.kirsch@kirschniehaus.com>; Lisa Frey <lisa.frey@kirschniehaus.com>

Cc: Kellogg, Michael K. <mkellogg@kelloggghansen.com>; Rapawy, Gregory G. <grapawy@kelloggghansen.com>

Subject: RE: In re. 9/11

Emily –

Please let us know your position on this issue and the issue raised in our November 4 letter (attached).

Thanks,

Andy

From: Shen, Andrew C.

Sent: Friday, November 5, 2021 9:10 AM

To: Emily Bab Kirsch (emily.kirsch@kirschniehaus.com) <emily.kirsch@kirschniehaus.com>; 'Lisa Frey' <lisa.frey@kirschniehaus.com>

Cc: Kellogg, Michael K. <mkellogg@kelloggghansen.com>; Rapawy, Gregory G. <grapawy@kelloggghansen.com>

Subject: In re. 9/11

Emily & Lisa –

The Court's October 21, 2021 Order required Kreindler & Kreindler to search for "documents (*e.g.*, personal email, text messages, iMessage, Signal, WhatsApp, phone history, voicemail) responsive to Saudi Arabia's requests Nos. 1 and 2 on the personal devices of witnesses named in the Court's order at ECF No. 7167." ECF No. 7277, at 5. The evidence presented at the November 1 and 2 hearing makes clear that Liz Crotty provided legal advice to Mr. Fawcett in connection with his breach of the protective order. Any communications between the named witnesses and Ms. Crotty during the relevant time period are responsive to Saudi Arabia's requests Nos. 1 and 2, which are reproduced below:

1. All documents and communications relating to the July 15, 2021 article written by Michael Isikoff, titled "FBI tried to flip Saudi official in 9/11 investigation."

2. All documents and communications relating to the leak of the confidential transcript of the Musaed Al Jarrah deposition to Michael Isikoff.

Please confirm that Kreindler & Kreindler has produced all communications and phone history between the named witnesses and Ms. Crotty, including from the personal devices of the named

witnesses. If Kreindler & Kreindler has not produced this material required by the October 21, 2021 Order, please do so by no later than November 10, 2021.

Regards,

Andrew C. Shen

Kellogg, Hansen, Todd, Figel & Frederick P.L.L.C.

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